

EXHIBIT A

STERLING REAM 11/4/2020

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 WESTERN DIVISION 4 TERRI YOLANDA LABLANCE,) 5) 6 Plaintiffs,) 7 vs.) 8) 9 MISSOURI DEPARTMENT OF) Case No. 4:19-cv-00693-BP 10 CORRECTIONS AND CORIZON) 11 HEALTH,) 12) 13 Defendants.) 14 15 ***** 16 VIDEOCONFERENCE DEPOSITION OF STERLING REAM 17 TAKEN ON BEHALF OF THE PLAINTIFF 18 NOVEMBER 4, 2020 19 ***** 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES 2 For the Plaintiffs: 3 Mr. Ivan Nugent 4 Krigel & Krigel, P.C. 5 4520 Main Street, Suite 700 6 Kansas City, MO 64111 7 tel: (816)756-5800 8 For Defendant Corizon: 9 Mr. Michael L. Matula 10 Ogletree Deakins 11 4520 Main Street, Suite 400 12 Kansas City, Missouri 64111 13 tel: (816)471-1301 14 15 For Department of Corrections: 16 Ms. Rachel Jag 17 Assistant Attorney General 18 615 E. 13th Street, Suite 401 19 Kansas City, Missouri 64106 20 tel: (816)889-5000 21 22 Also Present on Zoom: Jenny Meehan 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 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1 IT IS HEREBY STIPULATED AND AGREED, by and
2 between counsel for the PLAINTIFF and counsel for the
3 DEFENDANTS that this deposition may be taken in
4 shorthand by Joann Renee Richardson, Certified Court
5 Reporter, and afterwards transcribed into typewriting;
6 and the signature of the witness is expressly reserved.

7 * * * * *

8 MR. VIDEOGRAPHER: We are on the record.
9 Today's date is November 4, 2020, and the time is
10 11:36 a.m. This is the video-recorded deposition of
11 Sterling Ream in the matter of Terri Yolanda LaBlance
12 vs. Missouri Department of Corrections and Corizon
13 Health, Case No. 4:19-cv-00693, in United States
14 District Court, Western District of Missouri, Western
15 Division. This deposition is being held via WebEx video
16 conference.

17 The reporter's name is Joann Richardson. My
18 name is Chris Chandler. I'm the legal videographer.
19 And we are with Alaris Litigation Services. Today's
20 deposition is being held via videoconference with the
21 court reporter and the witness not appearing in the same
22 room together.

23 Would all the attorneys present please
24 introduce themselves, the parties that they represent,
25 and if they agree to this stipulation of the deposition

1 testimony in the case that's been described thus far?

2 A. Yes.

3 Q. All right. Just some housekeeping things.

4 First, the court reporter may have trouble hearing you
5 at times. So, if you would, just make sure you're
6 close to the computer in front of you so that she can
7 hear you and pick you up clearly. Secondly, if you
8 need a break, will you let me know so that we can take
9 that break?

10 A. Sure.

11 Q. My only ask is that you would answer whatever
12 question is before you prior to us going on that break.
13 Okay?

14 A. Okay.

15 Q. If you do not understand any of my questions, can
16 I trust that you will tell me that you don't understand
17 my question?

18 A. Yes.

19 Q. And then, lastly, can I assume that you will not
20 rely on any assistance from Ms. Meehan, who is in the
21 room with you?

22 A. Yes.

23 Q. Is there anyone else in the room with you right
24 now?

25 A. No.

1 taking place in this manner.

2 MR. NUGENT: Good morning. Ivan Nugent on
3 behalf of the Plaintiff, Terri LaBlance, and we consent
4 to the witness and court reporter being in separate
5 locations.

6 MR. MATULA: This is Mike Matula on behalf
7 of Corizon Healthcare. I also agree to the deposition
8 proceeding in this manner.

9 MS. JAG: This is Rachel Jag for the
10 Department of Corrections and we also stipulate and
11 agree to the deposition being taken in this manner.

12 MR. VIDEOGRAPHER: Thank you. Will the
13 court reporter please swear in the witness? And we may
14 proceed.

15 STERLING REAM,
16 being first duly sworn, produced and examined, testified
17 as follows:

18 EXAMINATION

19 QUESTIONS BY MR. NUGENT:

20 Q. Good morning, Ms. Ream. My name is Ivan Nugent
21 and I represent Terri LaBlance. We are here to take
22 your deposition in that case. Hopefully this will not
23 last very long. But, nonetheless, I do have some
24 questions and I'm hoping that you can answer them. Do
25 you understand that you are here today to give

1 Q. All right. And where are you currently?

2 A. I am in the green conference room at
3 Chillicothe Correctional Center.

4 Q. And prior to us starting, you were sworn in by
5 the court reporter to tell the truth. Do you
6 understand that you are obligated to tell the truth
7 today?

8 A. Yes.

9 Q. Great. Who do you work for?

10 A. Corizon Health.

11 Q. And what do you do for Corizon Health?

12 A. I am the director of nursing.

13 Q. How long have you been the director of nursing?

14 A. Almost -- it'll be a year in December.

15 Q. So you became the director of nursing in December
16 of 2019?

17 A. Correct.

18 Q. What was your title prior to becoming the
19 director of nursing?

20 A. I was the health services administrator.

21 Q. When did you become the health services
22 administrator?

23 A. I want to say in May or -- April or May of
24 2018, I think. Yes.

25 Q. When did you start working for Corizon?

Page 9	Page 11
<p>1 A. June of 2010.</p> <p>2 Q. You said June of 20 what?</p> <p>3 A. 2010.</p> <p>4 Q. What was your title prior to becoming health</p> <p>5 services administrator?</p> <p>6 A. I was an RN staff nurse PRN.</p> <p>7 Q. And is that what you were hired for in June 2010?</p> <p>8 A. No. I was an LPN then.</p> <p>9 Q. Are there any other job titles you've held other</p> <p>10 than director of nursing, health services</p> <p>11 administrator, RN, and LPN?</p> <p>12 A. No.</p> <p>13 Q. Was the health services administrator position a</p> <p>14 management position?</p> <p>15 A. Yes.</p> <p>16 Q. And is the director of nursing position a manager</p> <p>17 position?</p> <p>18 A. Yes.</p> <p>19 Q. When you became the health services</p> <p>20 administrator, did you receive a pay raise?</p> <p>21 A. Yes.</p> <p>22 Q. Is the acronym HSA health services administrator?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And then can we agree that DON is the</p> <p>25 acronym for director of nursing?</p>	<p>1 going to be. Was the pay different in the DON position</p> <p>2 from the HSA position?</p> <p>3 A. Yes. Sorry.</p> <p>4 Q. That's okay. In your HSA role, from</p> <p>5 approximately April or May of 2018 until December of</p> <p>6 2019, were you responsible for supervising any</p> <p>7 employees?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. What job titles did you supervise?</p> <p>10 A. RNs, LPNs. I mean, I wasn't directly over</p> <p>11 providers, but I was the supervisor for the site, if</p> <p>12 that makes sense.</p> <p>13 Q. It does. Who did you report to when you were the</p> <p>14 HSA?</p> <p>15 A. Jenny Meehan.</p> <p>16 Q. Is it safe to say for non-providers you were</p> <p>17 the -- you were the person in charge as the HSA?</p> <p>18 A. Yes.</p> <p>19 Q. When you became the director of nursing, did you</p> <p>20 have to apply for that position?</p> <p>21 A. I'm not sure if I applied, like an actual</p> <p>22 written application. No, I don't think I did.</p> <p>23 Q. Okay. Who was the director of nursing prior to</p> <p>24 you?</p> <p>25 A. Tammie Christopher.</p>
Page 10	Page 12
<p>1 A. Correct.</p> <p>2 Q. When you became the director of nursing, did that</p> <p>3 come with a pay increase?</p> <p>4 A. Yes.</p> <p>5 Q. How much of an increase between the HSA and the</p> <p>6 DON position?</p> <p>7 A. Well, actually, initially I believe it was the</p> <p>8 same, I think. Yes, around the same. Very close.</p> <p>9 Q. So did the DON position increase your pay at all?</p> <p>10 A. No, not initially.</p> <p>11 Q. Okay. When did --</p> <p>12 A. If it was, it was very minimal.</p> <p>13 Q. When did your pay increase?</p> <p>14 A. I'm sorry. Are you asking when I became DON?</p> <p>15 Q. Yes.</p> <p>16 A. Well, I guess I don't understand.</p> <p>17 Q. Okay. I don't really care how little or how big</p> <p>18 the increase was. I just want to know if there was an</p> <p>19 increase.</p> <p>20 A. There was an increase a few months ago.</p> <p>21 Q. Okay.</p> <p>22 A. That was the only -- but I guess what I was</p> <p>23 trying to say is that the HSA and DON position was,</p> <p>24 like, just very close to the same rate of pay.</p> <p>25 Q. Okay. And I don't mean to be technical, but I am</p>	<p>1 Q. And so after she left, you got the job?</p> <p>2 A. Well, no.</p> <p>3 Q. How did you get the job?</p> <p>4 A. She left, put in her notice to leave. I put</p> <p>5 in my notice to leave. I ended up staying as the</p> <p>6 HSA longer. Then I put my notice in to leave. And</p> <p>7 then I talked to the current HSA now who worked at a</p> <p>8 different institution. She basically said, If I</p> <p>9 would come on as the HSA, would you be my DON? And</p> <p>10 I thought about it and said yes.</p> <p>11 Q. What's her name?</p> <p>12 A. Kelley Tipton.</p> <p>13 Q. It sounded like I heard you say you put in your</p> <p>14 notice to leave twice. Is that accurate?</p> <p>15 A. No.</p> <p>16 Q. Okay.</p> <p>17 A. Well, maybe it is. I'm not sure. I don't</p> <p>18 know if I did it twice or just extended my -- I</p> <p>19 really cannot remember.</p> <p>20 Q. Why did you put in -- let's just start with the</p> <p>21 first time you can remember putting in your notice in</p> <p>22 20 -- this would have been 2019; is that right?</p> <p>23 A. Right.</p> <p>24 Q. In 2019, why did you put in your notice the first</p> <p>25 time?</p>

3 (Pages 9 to 12)

1 A. Stress. It was a lot of stress. I had little
 2 kids at home and it was consuming my life, my job
 3 was.
 4 **Q. What about the job was stressful?**
 5 A. Well, you're a manager of a health services
 6 ensuring the population is getting the health
 7 services that they need. And not to mention, you
 8 know, you have -- you're over the nurses and
 9 staffing. And it's a lot.
 10 **Q. What was your annual salary as the HSA?**
 11 A. I believe it was 79, around -- approximately.
 12 79 and some change.
 13 **Q. You mentioned the patient population. Correct me**
 14 **if I'm wrong, but Corizon provides healthcare services**
 15 **for inmates in Chillicothe Correctional Center; is that**
 16 **correct?**
 17 A. Yes.
 18 **Q. And it's a woman's facility; is that right?**
 19 A. That's correct.
 20 **Q. Do you know the racial demographics of the**
 21 **institution?**
 22 A. No, I do not.
 23 **Q. Okay. Would you say that most of the patients**
 24 **seen by Corizon are white patients?**
 25 A. I'm sorry, you cut out with that last part.

1 **Q. Sure. My question is, would you say that the**
 2 **majority of patients seen by Corizon at Chillicothe are**
 3 **Caucasian or white?**
 4 A. No, I would not say majority. I would say
 5 it's probably 50 percent, maybe.
 6 **Q. 50 percent white.**
 7 A. Correct.
 8 **Q. And what's the other 50 percent?**
 9 A. Hispanic, African American. I mean, I'm not
 10 sure the rest, but --
 11 **Q. Okay. What's your highest level of education?**
 12 A. Associate's degree.
 13 **Q. Are you married?**
 14 A. Yes.
 15 **Q. Does your spouse work for the Department of**
 16 **Corrections?**
 17 A. No.
 18 **Q. Do you have any relatives that work for the**
 19 **Department of Corrections?**
 20 A. I do.
 21 **Q. Can you tell me their names?**
 22 A. Sherry Walsh.
 23 **Q. And what does she do?**
 24 A. She is a cook, I believe.
 25 **Q. Anyone else?**

1 A. No.
 2 **Q. When did you first meet Terri LaBlance?**
 3 A. It was in 2017, probably shortly after she
 4 started.
 5 **Q. Okay. And do you recall what Ms. LaBlance --**
 6 **what her title was when she was hired?**
 7 A. Nurse practitioner.
 8 **Q. Would she be considered a provider?**
 9 A. Yes.
 10 **Q. So she didn't report to you, did she?**
 11 A. No.
 12 **Q. Ms. Ream, have you had your deposition taken**
 13 **before?**
 14 A. No.
 15 **Q. Outside of Ms. LaBlance, have you had any other**
 16 **African American colleagues?**
 17 A. Yes.
 18 **Q. Do you know how many?**
 19 A. Just for Corizon or for DOC, all -- I mean --
 20 **Q. For Corizon.**
 21 A. Okay. That I can recall right now, I think
 22 two other.
 23 **Q. So including Ms. LaBlance, does that make three?**
 24 A. Yes.
 25 **Q. Were those other two employed with Corizon prior**

1 **to Ms. LaBlance?**
 2 A. I'm sorry, prior to what?
 3 **Q. Prior to Ms. LaBlance.**
 4 A. Yes.
 5 **Q. Since Ms. LaBlance is no longer employed with**
 6 **Corizon, have there been any other African Americans**
 7 **that have worked for Corizon at Chillicothe?**
 8 A. I mean, we have a provider that comes to
 9 another institution that would come and help us. So
 10 I don't know if he was coming after she left. I
 11 can't remember.
 12 **Q. What's his name?**
 13 A. Dr. Eucadway. (Phonetic on name.)
 14 **Q. I'm going to show you some documents. Ms. Ream,**
 15 **do you see a document in front of you with a**
 16 **handwritten 12 in the bottom right-hand corner of it?**
 17 A. Yes.
 18 **Q. What I've put in front of you for record purposes**
 19 **is a document that's been previously used in**
 20 **depositions related to this case and it is identified**
 21 **as Deposition Exhibit 12. I am going to start on a**
 22 **page that's been Bates-labeled as Corizon 9. Do you**
 23 **see that in front of you right now?**
 24 A. Yes.
 25 **Q. All right. Prior to today have you reviewed any**

1 documents in preparation for your deposition?
 2 A. Yes.
 3 **Q. What documents did you look at?**
 4 A. This one.
 5 **Q. Any other documents?**
 6 A. Yes.
 7 **Q. What other documents?**
 8 A. My corrective action. There were six total.
 9 Let's see. This one, my corrective action, an
 10 email. I think two emails. I think it was an email
 11 or -- the email from Terri about Judy.
 12 **Q. Email from Terri about duty?**
 13 A. Judy Harkins.
 14 **Q. Got it. Is that the universe of documents that**
 15 **you looked at prior to today?**
 16 A. Correct.
 17 **Q. All right. I want to -- I want you to read your**
 18 **statement here and let me know when you're finished.**
 19 **You can just read it to yourself.**
 20 A. Yes. I'm done.
 21 **Q. Okay. Great. Do you remember this incident**
 22 **involving Ms. Barker and Ms. LaBlance?**
 23 A. Yes, I do.
 24 **Q. Were you present for the conversation?**
 25 A. No, I was not.

1 **Q. You said, "After Jenni." What's Jenni's last**
 2 **name?**
 3 A. Jenni Preston.
 4 **Q. Does Jenni Preston still work for Corizon?**
 5 A. No.
 6 **Q. Do you remember when she left?**
 7 A. I have no clue.
 8 **Q. All right. Do you recall who asked you to**
 9 **prepare this statement?**
 10 A. Yes. Teresa McWhorter.
 11 **Q. Does the statement -- as you've read it today, is**
 12 **it the same as it was when you wrote it in 2017?**
 13 A. Yes.
 14 **Q. Thank you. I want to bring up another document.**
 15 **Do you see a document in front of you that has the**
 16 **heading "Auditing Log Search Results"?**
 17 A. Yes.
 18 **Q. I'll represent to you that this is a list of**
 19 **individuals who accessed Ms. LaBlance's medical records**
 20 **from the Department of Corrections from January 1 of**
 21 **2017 to March 8th of 2019. This has also been**
 22 **previously used in depositions and is Deposition**
 23 **Exhibit 43. I'm on Page 3 of 4 that is Bates-labeled**
 24 **MDOC1942. Do you see your name there at the top?**
 25 A. Uh-huh. Yes.

1 **Q. Okay. On December 9, 2017, you accessed**
 2 **Ms. LaBlance's charting guide list page, right?**
 3 A. Yes.
 4 **Q. In the previous exhibit we were just looking at,**
 5 **which was the -- your statement in response to an**
 6 **incident between Ms. Barker and Ms. LaBlance, that was**
 7 **in August of 2017. Would you agree?**
 8 A. Yes, I believe so.
 9 **Q. Okay. And then approximately four months later,**
 10 **you're looking at the charting guide list page for**
 11 **Ms. LaBlance. Can you tell me why?**
 12 A. The current HSA at the time -- I was working
 13 in the ER. I don't know if it was that same day.
 14 I'm not sure. But there was some -- she was walking
 15 into the ER and had said something about Terri's
 16 criminal record. And, of course, I was surprised.
 17 And so curiosity because I really couldn't believe
 18 it.
 19 **Q. What were you curious about?**
 20 A. If it was true.
 21 **Q. Prior to December 9th, did you know whether or**
 22 **not Ms. LaBlance had a criminal record?**
 23 A. I don't believe so.
 24 **Q. Do you know?**
 25 A. I'm sorry. What? Do I know what?

1 **Q. Do you know whether or not she did?**
 2 A. I do, but don't know the fullest extent or
 3 anything. I mean, I don't know -- I know that she
 4 has a DOC number.
 5 **Q. Let me clear up my question just a little bit.**
 6 **The question is, prior to December 9th of 2017, did you**
 7 **know that Ms. LaBlance had a criminal record? And I**
 8 **believe your answer was that you did not know; is that**
 9 **right?**
 10 A. Yes. Correct. I believe so, yes.
 11 **Q. Okay. And so when was the first time that you**
 12 **learned that Ms. LaBlance had a criminal record?**
 13 A. It had to be around that time that I looked at
 14 the face page.
 15 **Q. Is the face page what you see if you're on the**
 16 **charting guide list page?**
 17 A. I'm guessing that's what they're calling it,
 18 yes.
 19 **Q. When you say you're guessing that's what they're**
 20 **calling it, who is they?**
 21 A. I mean, it doesn't have a name. It's just
 22 when you type in the number and the picture and the
 23 DOC number is there.
 24 **Q. Okay. Who was the person that came into the ER**
 25 **and mentioned it that you were referring to a moment**

Page 21	Page 23
<p>1 ago?</p> <p>2 A. Teresa McWhorter.</p> <p>3 Q. What was your impression of Ms. McWhorter's</p> <p>4 comments about Ms. LaBlance's records?</p> <p>5 A. What was my impression?</p> <p>6 Q. Yes.</p> <p>7 A. My impression was disbelief.</p> <p>8 Q. Okay. Did Ms. McWhorter appear to you to be</p> <p>9 surprised as well?</p> <p>10 A. Yes.</p> <p>11 Q. Did Ms. McWhorter tell you how she learned of</p> <p>12 Ms. LaBlance's DOC records?</p> <p>13 A. No.</p> <p>14 Q. Was there anyone else present with you when</p> <p>15 Ms. McWhorter told you about Ms. LaBlance's records?</p> <p>16 A. No.</p> <p>17 Q. So it was just you in the room?</p> <p>18 A. Right.</p> <p>19 Q. What did you do after Ms. McWhorter told you?</p> <p>20 A. Well, I was working in the ER, so I continued</p> <p>21 to work, I believe.</p> <p>22 Q. Okay. Did you tell anyone else what</p> <p>23 Ms. McWhorter had told you?</p> <p>24 A. No, I did not discuss it.</p> <p>25 Q. After she told you, you just looked up</p>	<p>1 A. Yes.</p> <p>2 Q. And you were written up in March of 2019, right?</p> <p>3 A. Yes.</p> <p>4 Q. So that was about a year and a half after you did</p> <p>5 it; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How did you feel about being written up</p> <p>8 about something that happened a year and a half ago?</p> <p>9 A. I feel like -- I mean, I felt bad. I've never</p> <p>10 been written up before in my career. You know,</p> <p>11 after -- I mean, I feel like I probably deserved it.</p> <p>12 Q. Do you know how Corizon found out that you</p> <p>13 accessed the record?</p> <p>14 A. No.</p> <p>15 Q. Was it surprising to you that they found out that</p> <p>16 you accessed it?</p> <p>17 A. Surprising? Maybe since it had been so long,</p> <p>18 yes.</p> <p>19 Q. Do you know whether or not any other individuals</p> <p>20 were written up?</p> <p>21 A. Yes.</p> <p>22 Q. Who do you know that was written up?</p> <p>23 A. Well, probably everybody that was on the page</p> <p>24 that accessed it. There were several. I don't</p> <p>25 remember everyone.</p>
Page 22	Page 24
<p>1 Ms. LaBlance in the MOCIS software; is that right?</p> <p>2 A. Right.</p> <p>3 Q. Did you search by name or by number?</p> <p>4 A. I believe name. I wouldn't have had a number.</p> <p>5 Q. What were your hours in December of 2017?</p> <p>6 A. I was PRN.</p> <p>7 Q. Okay. So you worked as needed?</p> <p>8 A. Yes.</p> <p>9 Q. When you worked as needed were you called in to</p> <p>10 shifts, or were you called in for a specific amount of</p> <p>11 time?</p> <p>12 A. It would vary. I would be called in last</p> <p>13 minute or it could have been a scheduled shift. I'm</p> <p>14 not sure.</p> <p>15 Q. So at 4:46 p.m., is that in the middle of a</p> <p>16 shift?</p> <p>17 A. No.</p> <p>18 Q. Is it at the end of the shift?</p> <p>19 A. No. It would be -- I'm assuming that maybe I</p> <p>20 was working 3 to 11, maybe. I'm not sure.</p> <p>21 Q. So what's the shift that's before the 3-to-11</p> <p>22 shift?</p> <p>23 A. Well, it used to be 6:45 to 3 or 7 to 3.</p> <p>24 Q. So you were written up for accessing</p> <p>25 Ms. LaBlance's records, right?</p>	<p>1 Q. Okay. Do you know Judy Harkins?</p> <p>2 A. Yes.</p> <p>3 Q. Does she still work for Corizon?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know whether or not Ms. Harkins was</p> <p>6 written up?</p> <p>7 A. I couldn't tell you for sure, but I think</p> <p>8 anybody who did received corrective action.</p> <p>9 Q. Okay. Is it safe to say that your opinion is</p> <p>10 anybody who did should have been written up?</p> <p>11 A. Yes.</p> <p>12 Q. All right. And tell me what your understanding</p> <p>13 is of why you were written up.</p> <p>14 A. Because I accessed her face page.</p> <p>15 Q. Do you believe that you were written up for</p> <p>16 accessing HIPAA-protected information?</p> <p>17 A. Well, now -- I mean, I didn't think of the</p> <p>18 face page as being a HIPAA violation. But now I</p> <p>19 feel like I -- you know, obviously it was not the</p> <p>20 right thing to do.</p> <p>21 Q. Well, why wasn't it the right thing to do, in</p> <p>22 your opinion?</p> <p>23 A. Because I worked with her and she wasn't a</p> <p>24 patient of mine.</p> <p>25 Q. Okay. So if I'm understanding your testimony</p>

6 (Pages 21 to 24)

<p style="text-align: right;">Page 25</p> <p>1 correctly, are you saying because you accessed</p> <p>2 information that you should not have accessed?</p> <p>3 A. Right, her face page. Right.</p> <p>4 Q. Would you refer to her face page as</p> <p>5 HIPAA-protected information?</p> <p>6 A. Well, her date of birth is on there. So yes.</p> <p>7 Q. Ms. Ream, I have tried to put the next document</p> <p>8 in front of you. It's been used in prior depositions</p> <p>9 and it is labeled Deposition Exhibit 15. Do you see a</p> <p>10 15 in front of you?</p> <p>11 A. Yes.</p> <p>12 Q. All right. I have scrolled to the bottom of</p> <p>13 Exhibit 15. It is Corizon 23 and Corizon 24. Is this</p> <p>14 one that you reviewed prior to your deposition today?</p> <p>15 A. I believe so, yes.</p> <p>16 Q. This is an email from Terri LaBlance to you and</p> <p>17 Dr. Epperson and she copies Jerry Lovelace, Jenny</p> <p>18 Meehan and Valicia Kirby. Do you see where I am?</p> <p>19 A. It's really small, but yes.</p> <p>20 Q. One second. Is that better?</p> <p>21 A. Yes.</p> <p>22 Q. Do you remember receiving this email from</p> <p>23 Ms. LaBlance?</p> <p>24 A. Yes.</p> <p>25 Q. Do you see where it says, "The lab tech refused</p>	<p style="text-align: right;">Page 27</p> <p>1 A. Right. Yeah. So it was to me and then</p> <p>2 Jerry -- Dr. Lovelace and Jenny were cc'd on it. I</p> <p>3 believe I forwarded it, but maybe I didn't since</p> <p>4 they were already on it. I'm not sure.</p> <p>5 Q. So is it safe to say you don't know whether you</p> <p>6 forwarded it or not?</p> <p>7 A. No.</p> <p>8 Q. Okay. The date that Terri sent this is June 6th</p> <p>9 of 2018. And we were just looking at Exhibit 43 that</p> <p>10 showed you accessing Ms. LaBlance's face sheet about</p> <p>11 seven months before.</p> <p>12 A. Uh-huh.</p> <p>13 Q. Is that accurate?</p> <p>14 A. I think so, yes.</p> <p>15 Q. In between December of '17 and June 6, 2018, do</p> <p>16 you recall whether you told anyone about Ms. LaBlance's</p> <p>17 Department of Corrections records?</p> <p>18 A. No.</p> <p>19 Q. Did you tell anyone about her records?</p> <p>20 A. I don't believe so.</p> <p>21 Q. When you say you don't believe so, are you sure?</p> <p>22 A. I don't think I would have discussed it with</p> <p>23 anybody. The rumor was flying around with the</p> <p>24 nurses. I'd heard people mention it and talk about</p> <p>25 it. But, no, I do not believe that I discussed it</p>
<p style="text-align: right;">Page 26</p> <p>1 to complete the requisition and took the specimen to my</p> <p>2 office and sat it on my desk while stating, 'I told you</p> <p>3 not to sit that on my desk'?"</p> <p>4 A. Yes, I see that.</p> <p>5 Q. All right. Do you recall what the specimen was?</p> <p>6 A. It was urine.</p> <p>7 Q. In a small cup?</p> <p>8 A. Yes.</p> <p>9 Q. And is that cup see-through?</p> <p>10 A. Yes.</p> <p>11 Q. Did that cup have a lid on it; do you know?</p> <p>12 A. I do not know that. I'm assuming it did.</p> <p>13 Q. Okay. Ms. Ream, I just scrolled through all of</p> <p>14 the emails that are present here and I did not see that</p> <p>15 you emailed anything related to this incident.</p> <p>16 A. No.</p> <p>17 Q. Do you recall whether you did write an email</p> <p>18 related to this incident?</p> <p>19 A. No, I don't believe so. I forwarded the</p> <p>20 emails to my supervisor.</p> <p>21 Q. You forwarded --</p> <p>22 A. I believe that -- I'm sorry. Can you scroll</p> <p>23 back up? I think it was to me, wasn't it, initially</p> <p>24 from Terri?</p> <p>25 Q. So this is the first email on Corizon 23 and 24.</p>	<p style="text-align: right;">Page 28</p> <p>1 with anybody, that I can remember.</p> <p>2 Q. With regards to those rumors, when did you start</p> <p>3 hearing those rumors?</p> <p>4 A. Well, about the time that I heard them.</p> <p>5 Q. So around December of 2017?</p> <p>6 A. Correct.</p> <p>7 Q. And did you hear those rumors throughout 2018?</p> <p>8 A. No, I don't believe so.</p> <p>9 Q. Okay. Did you hear those rumors prior to</p> <p>10 Ms. LaBlance leaving Corizon?</p> <p>11 A. Yes.</p> <p>12 Q. Ms. LaBlance left in February of 2019. Did you</p> <p>13 hear those rumors in January or February of 2019 or</p> <p>14 prior to?</p> <p>15 A. Probably around January or February -- well,</p> <p>16 I'm assuming -- no, I think it was more like</p> <p>17 February.</p> <p>18 Q. Okay. When you say it was rumors discussed or,</p> <p>19 you know -- the nurses were a part of this or whatnot,</p> <p>20 which nurses?</p> <p>21 A. In 20 --</p> <p>22 Q. Whenever you heard these rumors?</p> <p>23 A. Initially in December?</p> <p>24 Q. Yeah.</p> <p>25 A. Everyone at the time. I mean, I don't want to</p>

7 (Pages 25 to 28)

<p style="text-align: right;">Page 29</p> <p>1 say everyone, but I can't remember specifically who.</p> <p>2 Q. Okay. How many Corizon employees were there at</p> <p>3 Chillicothe in December of '17?</p> <p>4 A. That I do not know.</p> <p>5 Q. Did it feel like everyone was talking about in</p> <p>6 December of 2017?</p> <p>7 A. Well, maybe not everybody. It didn't last</p> <p>8 long.</p> <p>9 Q. How long did it last?</p> <p>10 A. I don't know. I can't remember. I had</p> <p>11 forgotten about it from then until February of 2019,</p> <p>12 probably.</p> <p>13 Q. Did it concern you at the time that employees</p> <p>14 were talking about a rumor like that?</p> <p>15 A. Yes.</p> <p>16 Q. Did you do anything about it?</p> <p>17 A. Maybe I misunderstood the question. I was</p> <p>18 only a staff nurse at that time.</p> <p>19 Q. So the fact that you were only a staff nurse at</p> <p>20 that time, what does that mean with regards to whether</p> <p>21 you could have done anything about it or not?</p> <p>22 A. Done anything about people talking about it?</p> <p>23 Q. Yes.</p> <p>24 A. Well, my boss at the time was talking about</p> <p>25 it. So she knew. And I assumed if she told a staff</p>	<p style="text-align: right;">Page 31</p> <p>1 complaining about; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know whether Ms. Harkins was a part of the</p> <p>4 group that you were discussing with regards to the</p> <p>5 rumors being spread around about Ms. LaBlance and her</p> <p>6 Department of Corrections record?</p> <p>7 A. No.</p> <p>8 Q. Do you know any of the names that were discussing</p> <p>9 Ms. LaBlance's criminal records around December of</p> <p>10 2017, other than Ms. McWhorter?</p> <p>11 A. No.</p> <p>12 Q. Okay. With regards to the nurses in 2017 -- in</p> <p>13 December of 2017, were there more than ten nurses?</p> <p>14 A. I would think so, yes.</p> <p>15 Q. Were there more than 20 nurses?</p> <p>16 A. I am not sure. I don't know.</p> <p>17 Q. Okay. Were there more than 30 nurses?</p> <p>18 A. I do not know.</p> <p>19 Q. Okay. Do you know whether there were more than</p> <p>20 40?</p> <p>21 A. No, I do not know.</p> <p>22 Q. Do you know if there were more than 50 nurses?</p> <p>23 A. No, I do not know.</p> <p>24 Q. Okay. Do you know if there were more than 100</p> <p>25 nurses?</p>
<p style="text-align: right;">Page 30</p> <p>1 nurse, she probably told more than just me. I mean,</p> <p>2 she's my supervisor. She was my supervisor. So,</p> <p>3 you know, she'd already knew about it. I don't know</p> <p>4 who I would report it to.</p> <p>5 Q. And your boss was Teresa McWhorter, right?</p> <p>6 A. Correct.</p> <p>7 Q. Who was Teresa McWhorter's supervisor?</p> <p>8 A. I believe Jenny -- I'm not sure at that time</p> <p>9 if it was Jenny or Pat.</p> <p>10 Q. Okay. Could you have told Jenny or Pat about the</p> <p>11 rumors that you were hearing?</p> <p>12 A. Well, at the time probably I didn't think to</p> <p>13 do that. I didn't know them. They weren't my</p> <p>14 supervisors. And at that time, I -- no.</p> <p>15 Q. In June of 2018, when Terri LaBlance sends you</p> <p>16 this email that you did not forward, did you tell</p> <p>17 anyone then about the rumors that you had heard and --</p> <p>18 A. No.</p> <p>19 Q. -- the fact that it might be relevant to this</p> <p>20 email?</p> <p>21 A. No.</p> <p>22 Q. Okay. Do you see this email here that you're</p> <p>23 copied on from Jenny Meehan? It says, "I have</p> <p>24 discussed this with Ms. LaBlance and Judy Harkins."</p> <p>25 Judy Harkins is the lab tech that Ms. LaBlance is</p>	<p style="text-align: right;">Page 32</p> <p>1 A. No. There was not more than 100, no.</p> <p>2 Q. So there weren't more than 100 nurses?</p> <p>3 A. No. I don't know the number of staff that</p> <p>4 they had at that time.</p> <p>5 Q. I understand you don't know the exact number.</p> <p>6 I'm asking if you know whether there were more than</p> <p>7 ten.</p> <p>8 A. Probably.</p> <p>9 Q. Were there more than 20?</p> <p>10 MR. MATULA: Object to form. You just asked</p> <p>11 these exact same questions. Go ahead.</p> <p>12 Q. (By Mr. Nugent) You can answer.</p> <p>13 A. I'm sorry? Somebody was talking. I didn't</p> <p>14 hear.</p> <p>15 Q. So your attorney just made an objection for the</p> <p>16 record, but you can answer the question. So were there</p> <p>17 more than 20 nurses?</p> <p>18 A. I do not know. I don't have an exact count,</p> <p>19 so therefore I can't confirm how many nurses there</p> <p>20 were. If there was more than ten, I do believe</p> <p>21 there was. If there was more than 20, I'm not sure.</p> <p>22 Q. That's helpful. Thank you.</p> <p>23 A. Okay.</p> <p>24 Q. As a nurse for Corizon at the Chillicothe</p> <p>25 facility, do you utilize the MOCIS software daily?</p>

8 (Pages 29 to 32)

1 A. Yes.
 2 **Q. All right. Ms. Ream, I'm going to ask you if you**
 3 **know a number of names. And then if you do, I'll have**
 4 **a couple of follow-ups. Do you know Deborah Ritter?**
 5 A. Yes.
 6 **Q. Is she still employed with Corizon?**
 7 A. No.
 8 **Q. Do you know Megan Rex?**
 9 A. Yes.
 10 **Q. Do you know Jessica Frizzell?**
 11 A. Yes.
 12 **Q. Is she still employed?**
 13 A. Yes.
 14 **Q. Do you know Brandon Doss?**
 15 A. No, I do not.
 16 **Q. Okay. Do you know Lori Switzer?**
 17 A. Yes.
 18 **Q. Do you know Brandy Baker?**
 19 A. Yes.
 20 **Q. Do you know whether Brandy is still employed with**
 21 **Corizon?**
 22 A. No, she is not.
 23 **Q. Do you know Shannon Burris?**
 24 A. Yes.
 25 **Q. Do you know Teresa Hamilton?**

1 A. Yes.
 2 **Q. Do you know whether Teresa Hamilton was one of**
 3 **the nurses talking about Ms. LaBlance's Department of**
 4 **Corrections records?**
 5 A. I'm not -- could possibly, yes. I'm not sure
 6 if it was her or not.
 7 **Q. Okay. Do you know Tabitha Johnson?**
 8 A. Yes.
 9 **Q. Do you know whether she was one of the nurses**
 10 **talking about Ms. LaBlance's Department of Corrections**
 11 **records?**
 12 A. I don't know.
 13 **Q. Do you know Rachel Rempel?**
 14 A. Yes.
 15 **Q. Okay. Is she still employed?**
 16 A. Yes.
 17 **Q. I've got a different list of names here I want to**
 18 **ask you about. Do you know Nicholas Koenig?**
 19 A. I believe so.
 20 **Q. Last name is spelled K-O-E-N-I-G.**
 21 A. I think, yes.
 22 **Q. How do you know Nicholas?**
 23 A. If it's the same -- I think that's a husband
 24 to an employee.
 25 **Q. Which employee?**

1 A. Amanda.
 2 **Q. What's Amanda's last name?**
 3 A. Koenig.
 4 **Q. Is she still employed by Corizon?**
 5 A. Yes.
 6 **Q. What's her title?**
 7 A. She's a dental assistant.
 8 **Q. Do you know when Ms. Koenig started with Corizon?**
 9 A. I do not.
 10 **Q. Okay. Do you know April Wolf?**
 11 A. Yes.
 12 **Q. Does April work for the Department of**
 13 **Corrections?**
 14 A. Yes.
 15 **Q. Do you know Dustin Lybarger?**
 16 A. Yes, I believe so. I don't -- I know last
 17 names more than I know first names. So I'm not
 18 positive that that's the same person, but I think it
 19 is.
 20 **Q. What about Bradley Richards?**
 21 A. I don't know who that is.
 22 **Q. Okay. If I told you that Dustin Lybarger was a**
 23 **Department of Corrections employee, would that be the**
 24 **person that you believe you know?**
 25 A. I think so, yes.

1 **Q. Do you know a Jeff Parque? (Phonetic on name.)**
 2 A. Yes.
 3 **Q. Department of Corrections employee?**
 4 A. Yes.
 5 **Q. Mindy Rhodes?**
 6 A. No, I don't know that person.
 7 **Q. What about Ashton Christopher?**
 8 A. Yes.
 9 **Q. A DOC employee?**
 10 A. Yes.
 11 **Q. And Phillip Bower?**
 12 A. I do not know who that is.
 13 **Q. Any of the DOC names that I just read off, do you**
 14 **socialize outside of the workplace with any of them?**
 15 A. No.
 16 **Q. Ms. Ream, have you looked at any other DOC**
 17 **records out of curiosity in the same way in which you**
 18 **looked at Ms. LaBlance's records?**
 19 A. No.
 20 **Q. You should have a document on your screen. It's**
 21 **been marked as Deposition Exhibit 46. Do you see that?**
 22 A. Yes.
 23 **Q. All right. It is Bates-labeled Corizon 1006.**
 24 **Can you identify what Exhibit 46 is, please?**
 25 A. It's my corrective action.

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<p>1 Q. Is this one of the documents that you reviewed</p> <p>2 prior to today?</p> <p>3 A. Yes.</p> <p>4 Q. All right. I asked you a couple of questions</p> <p>5 about it already, but you received this on March 25,</p> <p>6 2019; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. And is that your signature there?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. To make sure that I have my timeline</p> <p>11 right, in December of 2017 when you accessed</p> <p>12 Ms. LaBlance's record, you were a staff nurse at that</p> <p>13 point; is that right?</p> <p>14 A. Correct.</p> <p>15 Q. And then in April you had -- in April of 2018 you</p> <p>16 became the HSA, right?</p> <p>17 A. Around that time, yes.</p> <p>18 Q. Did you apply for the position -- for the HSA</p> <p>19 position?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Filled out an application and everything?</p> <p>22 A. Yes.</p> <p>23 Q. Did you have to interview for that position?</p> <p>24 A. Yes, I did.</p> <p>25 Q. Do you remember who you interviewed with?</p>	<p>1 Q. Did you complete the HIPAA training?</p> <p>2 A. I did.</p> <p>3 Q. Outside of reviewing the Details of Current</p> <p>4 Incident and the expectations discussed, was there any</p> <p>5 other conversation with you and Ms. Meehan about this</p> <p>6 write-up?</p> <p>7 A. Not that I can recall.</p> <p>8 Q. Did you offer a rebuttal to Ms. Meehan about the</p> <p>9 write-up?</p> <p>10 A. No.</p> <p>11 Q. Did you agree with the write-up?</p> <p>12 A. Yes.</p> <p>13 Q. Did you sit in on anyone else's reprimand as a</p> <p>14 result of the individuals accessing Ms. LaBlance's</p> <p>15 records?</p> <p>16 A. Yes. I had to give the employees that were</p> <p>17 underneath me, I had to give them their write-ups.</p> <p>18 Q. Do you recall who that was?</p> <p>19 A. I don't. There was several.</p> <p>20 Q. Do you see Exhibit 45 in front of you?</p> <p>21 A. Yes.</p> <p>22 Q. And this is Corizon 1005. Do you see where it</p> <p>23 says "witness signature"?</p> <p>24 A. Yes.</p> <p>25 Q. Is that your signature?</p>
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<p>1 A. I interviewed with Jenny and Cindy Schupp.</p> <p>2 Jenny Meehan and Cindy Schupp.</p> <p>3 Q. Thank you. Who issued this reprimand to you?</p> <p>4 A. Jenny Meehan.</p> <p>5 Q. Okay. I'm looking at the Details of Current</p> <p>6 Incident section here. Did she tell you how she was</p> <p>7 notified about your accessing the face sheet?</p> <p>8 A. No.</p> <p>9 Q. And I assume that Ms. Meehan met with you</p> <p>10 face-to-face about this; is that right?</p> <p>11 A. Yes.</p> <p>12 Q. Was there anyone else present in that meeting?</p> <p>13 A. Well, Tammie and I shared an office at that</p> <p>14 time. I think Tammie was in there, maybe. I think</p> <p>15 so.</p> <p>16 Q. So you, Tammie Christopher and Jenny Meehan?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. What did Ms. Meehan tell you in this</p> <p>19 meeting on March 25th?</p> <p>20 A. Well, the Details of Current Incident was</p> <p>21 read.</p> <p>22 Q. So this paragraph was read to you here, the</p> <p>23 Details of Current Incident?</p> <p>24 A. Right. And the expectations to complete the</p> <p>25 HIPAA training.</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. And this is Tammie Christopher's</p> <p>3 Corrective Action Form. Is she someone that you had to</p> <p>4 sit in on with regards to giving discipline?</p> <p>5 A. Yes.</p> <p>6 Q. And why was Ms. Christopher disciplined?</p> <p>7 A. Because of the same thing.</p> <p>8 Q. That you were disciplined for?</p> <p>9 A. Correct.</p> <p>10 Q. Did anyone tell you why you had to sit in on</p> <p>11 Ms. Christopher's reprimand?</p> <p>12 A. Well, I was her direct supervisor at the time.</p> <p>13 Q. So on the same date that you were reprimanded,</p> <p>14 you sat in on these other reprimands; is that accurate?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. In discussing why Ms. Christopher was</p> <p>17 reprimanded, did you have knowledge of when</p> <p>18 Ms. Christopher accessed Ms. LaBlance's records?</p> <p>19 A. No.</p> <p>20 Q. Were you a part of recommending the level of</p> <p>21 discipline that Ms. Christopher received?</p> <p>22 A. No.</p> <p>23 Q. Who made that decision?</p> <p>24 A. I believe -- I'm not sure. Maybe Jenny. I</p> <p>25 don't know.</p>

10 (Pages 37 to 40)

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<p>1 Q. Did you feel like the first written counseling</p> <p>2 was the appropriate level of discipline?</p> <p>3 A. Yes.</p> <p>4 Q. I'm going to clarify. Do you feel that that was</p> <p>5 the appropriate level of discipline for</p> <p>6 Ms. Christopher?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. That's also the same level of discipline</p> <p>9 that you received. Do you feel that it was the</p> <p>10 appropriate level for you?</p> <p>11 A. Yes.</p> <p>12 Q. Why do you believe that it was the appropriate</p> <p>13 level for you?</p> <p>14 A. Why do I believe it was the appropriate level</p> <p>15 for me? Because I did not access a medical record.</p> <p>16 It was a face sheet.</p> <p>17 Q. Okay. Do you see Exhibit 46 in front of you?</p> <p>18 A. Yes.</p> <p>19 Q. That was yours. Apologies. Do you see Exhibit</p> <p>20 47?</p> <p>21 A. Yes.</p> <p>22 Q. Exhibit 47 is Corizon 1003. Is that your</p> <p>23 signature there on the manager's line?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. On Tammie Christopher's, your signature</p>	<p>1 anyone else in the room other than you, Tabitha, and</p> <p>2 Tammie Christopher?</p> <p>3 A. No.</p> <p>4 Q. Do you recall what you said to Ms. Johnson about</p> <p>5 why she was being written up?</p> <p>6 A. I read the Details of Current Incident and the</p> <p>7 expectations discussed.</p> <p>8 Q. Did she ask you any questions?</p> <p>9 A. No, I don't believe so. I don't believe</p> <p>10 anybody did.</p> <p>11 Q. Was there anybody that disagreed with being</p> <p>12 written up for accessing Ms. LaBlance's records?</p> <p>13 A. No, I don't believe so. Not that I can</p> <p>14 recall.</p> <p>15 Q. Do you see Exhibit 48 in front of you?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have an Exhibit 48 in front of you?</p> <p>18 A. Yes.</p> <p>19 Q. All right. This is the Corrective Action Form</p> <p>20 for Deborah Ritter. Is that your signature there on</p> <p>21 the manager's signature line?</p> <p>22 A. Yes.</p> <p>23 Q. And is that Tammie Christopher below you?</p> <p>24 A. Yes.</p> <p>25 Q. Was Ms. Ritter also being written up for</p>
Page 42	Page 44
<p>1 was on the witness signature line. Do you know why --</p> <p>2 do you know why there's a difference?</p> <p>3 A. Well, because Tammie is not my supervisor, or</p> <p>4 was not.</p> <p>5 Q. Was Tabitha someone that you sat in on the first</p> <p>6 written counseling discipline session?</p> <p>7 A. Yes. Tammie and I gave the corrective actions</p> <p>8 to the employees.</p> <p>9 Q. Okay. So you and Tammie Christopher gave Tabitha</p> <p>10 Johnson this corrective action form?</p> <p>11 A. Yes. We both signed it.</p> <p>12 Q. Is that Tammie Christopher's signature on the</p> <p>13 bottom there?</p> <p>14 A. Yes.</p> <p>15 Q. And I think we said that's yours in the middle;</p> <p>16 is that right?</p> <p>17 A. Yes.</p> <p>18 Q. Did you believe that the first written counseling</p> <p>19 was the appropriate level of discipline for Tabitha</p> <p>20 Johnson?</p> <p>21 A. Yes.</p> <p>22 Q. Why is that?</p> <p>23 A. Because it says that she accessed the face</p> <p>24 sheet.</p> <p>25 Q. When you met with Tabitha Johnson, was there</p>	<p>1 accessing Ms. LaBlance's Department of Corrections</p> <p>2 records?</p> <p>3 A. Her face sheet, yes.</p> <p>4 Q. Okay. Did you agree with this level of</p> <p>5 discipline for Ms. Ritter?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know who from Corizon looked into the</p> <p>8 employees that accessed Ms. LaBlance's records?</p> <p>9 A. I do not.</p> <p>10 Q. Were you presented with these corrective action</p> <p>11 forms and told to present them to the employees?</p> <p>12 A. Yes.</p> <p>13 Q. And that was done by Jenny Meehan; is that right?</p> <p>14 A. Right.</p> <p>15 Q. Was there anyone else present when Jenny Meehan</p> <p>16 told you to give these corrective action forms?</p> <p>17 A. I believe Tammie was.</p> <p>18 Q. Do you have an Exhibit 49 in front of you?</p> <p>19 A. Yes.</p> <p>20 Q. This is Corizon 1004. Is that your signature</p> <p>21 under the manager's signature line?</p> <p>22 A. Yes.</p> <p>23 Q. And is that Tammie Christopher below you?</p> <p>24 A. Yes.</p> <p>25 Q. And this is the corrective action form for</p>

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1 Jessica Frizzell; is that right?

2 A. Yes.

3 Q. I assume you agreed with the level of discipline

4 given to Ms. Frizzell.

5 A. Yes.

6 Q. I believe that that's all of the discipline forms

7 that I was given. Do you recall whether there was

8 anyone else that was disciplined for accessing

9 Ms. LaBlance's records?

10 A. It seems that there was more than that.

11 Q. Okay. When you say it seems like there was more

12 than that, can you tell me why you think that?

13 A. Because I'm pretty sure there was several.

14 Q. Who else?

15 A. I don't know, but it seems like there was

16 more. I could be wrong, but it seemed like there

17 was more.

18 Q. When you say it seems like there was more, more

19 people that report to you?

20 A. Right.

21 Q. Okay. Are you aware of any other Corizon

22 employees having been written up for accessing records

23 of non-patients?

24 A. Not that I know of.

25 Q. In talking to Ms. Christopher this morning, she

1 mentioned that Val Kirby and/or Dr. Epperson may have

2 come into the office that you and Ms. Christopher

3 shared and talked about Ms. LaBlance's records in the

4 MOCIS system. Do you recall something like that

5 happening?

6 A. Well, I don't know that it was in the MOCIS

7 system. It was more of -- it was discovered by them

8 that she had a record and asked me if I knew about

9 that.

10 Q. Who asked you if you knew about that?

11 A. Dr. Epperson.

12 Q. When did Dr. Epperson ask you?

13 A. It must have been in mid February, probably.

14 Somewhere in there.

15 Q. Why does that stick out to you, mid February?

16 A. Because that's when -- it was around the

17 time -- well, Terri's last day, around that time.

18 Q. Okay. Prior to mid February, did you have

19 any other conversations with Ms. Kirby or Dr. Epperson

20 about Ms. LaBlance's records?

21 A. No.

22 Q. Who was present when Dr. Epperson was talking to

23 you about Ms. LaBlance's records?

24 A. Maybe Tammie. We share an office, so chances

25 were good she was in there, but I'm not sure she

1 was. I'm not positive.

2 Q. Okay. What did Ms. Epperson tell you about those

3 records?

4 A. She just said, "She has a criminal background

5 and I'm her collaborating physician." She was more

6 expressing that she was hurt that she wasn't told,

7 because her and Terri were very good friends. And

8 basically that, you know, if she was the

9 collaborating physician, she should have been aware

10 of that. And I directed her to the regional office

11 because I was not -- I wasn't going to discuss it.

12 Q. In mid February when Dr. Epperson had this

13 conversation with you, you knew that Ms. LaBlance had a

14 criminal record, right?

15 A. I had known, yes.

16 Q. Why didn't you want to discuss it with

17 Dr. Epperson?

18 A. I didn't think it was my place.

19 Q. Prior to this mid February conversation with

20 Dr. Epperson, did you have any conversations with

21 Dr. Epperson about Ms. LaBlance and whether or not

22 those two got along?

23 A. Whether they got along or not? Val,

24 Dr. Epperson and Terri were all very close. Good

25 friends.

1 Q. Okay. Was Dr. Epperson also good friends with

2 Tammie Christopher?

3 A. I wouldn't say good friends, no. We didn't --

4 I don't think Tammie -- no.

5 Q. So earlier we looked at the corrective action

6 form for Jessica Frizzell and we saw your signature on

7 the manager's signature line. Ms. Frizzell was a

8 dental assistant; is that right?

9 A. Right.

10 Q. So did the dental non-providers report to you?

11 A. Yes.

12 Q. And the rumors that you referenced earlier, were

13 those rumors also extending to the dental staff?

14 A. I don't know for sure. Probably. I would

15 assume.

16 MR. MATULA: Ivan, we've been going for

17 about an hour or so. Is this now a decent time for a

18 little break? How much more time do you think?

19 MR. NUGENT: We can take a break. That's

20 fine. Let's just go off the record.

21 MR. VIDEOGRAPHER: We're going off the

22 record. The time is 1:02 p.m.

23 (Off the record.)

24 _____

25 (Back on the record.)

<p style="text-align: right;">Page 49</p> <p>1 MR. VIDEOGRAPHER: We are back on the</p> <p>2 record. The time is 1:10 p.m.</p> <p>3 Q. (By Mr. Nugent) Ms. Ream, can you hear me?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. We just took a short break. We're back.</p> <p>6 Do you understand that you are still under oath?</p> <p>7 A. Yes.</p> <p>8 Q. I've got just a few more questions and I will be</p> <p>9 done. Let me share a document with you. You should</p> <p>10 have in front of you Exhibit 43. We've looked at it</p> <p>11 before. Do you have that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And, again, this is the audit log of</p> <p>14 individuals who accessed Ms. LaBlance's records. And I</p> <p>15 want to go to yours really quick. If you remember,</p> <p>16 your entry on December 9th shows that you accessed the</p> <p>17 charting guide list page. Would you agree with me that</p> <p>18 that's the face sheet?</p> <p>19 A. Yes.</p> <p>20 Q. And I believe your testimony is that that is</p> <p>21 not -- it doesn't contain HIPAA information. That's</p> <p>22 your understanding; is that right?</p> <p>23 A. Well, yes. It doesn't have any medical</p> <p>24 information on the face sheet.</p> <p>25 Q. Judy Harkins reported to you in March of 2019,</p>	<p style="text-align: right;">Page 51</p> <p>1 A. Yes, I think so.</p> <p>2 Q. Have you told the truth today?</p> <p>3 A. Yes, I have.</p> <p>4 MR. NUGENT: Thank you. I don't have</p> <p>5 anything further.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 MS. JAG: I have no questions at this time</p> <p>8 either.</p> <p>9 MR. MATULA: I have no questions at this</p> <p>10 time. We'll have the witness read and sign and you can</p> <p>11 send it through me. Sterling, you're done.</p> <p>12 THE WITNESS: Okay. Thank you.</p> <p>13 MR. VIDEOGRAPHER: That concludes today's</p> <p>14 deposition of Sterling Ream. We're going off the</p> <p>15 record. The time is 1:14 p.m.</p> <p>16 [The deposition was concluded at 1:14 p.m.]</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 50</p> <p>1 right?</p> <p>2 A. Reported to me?</p> <p>3 Q. She was one of the employees that reported to you</p> <p>4 or was a subordinate of yours?</p> <p>5 A. Oh. Yes. Yeah.</p> <p>6 Q. Okay. And here it says that Judy Harkins</p> <p>7 accessed on February 20th at 7:33 a.m. the medication</p> <p>8 order list page. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Would you agree with me that the medication order</p> <p>11 list page likely has medical information that's</p> <p>12 protected by HIPAA?</p> <p>13 A. It could.</p> <p>14 Q. Okay. You didn't sit in on a reprimand meeting</p> <p>15 with Ms. Harkins, did you?</p> <p>16 A. I don't believe -- not that I remember. I'm</p> <p>17 not sure.</p> <p>18 Q. If I told you that I've asked Corizon for</p> <p>19 everyone that's been reprimanded and they told me that</p> <p>20 Judy Harkins was not, would that surprise you?</p> <p>21 A. It would.</p> <p>22 Q. Ms. Ream, are there any questions that you'd like</p> <p>23 to revisit?</p> <p>24 A. I don't think so.</p> <p>25 Q. Have you understood all of my questions?</p>	<p style="text-align: right;">Page 52</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2 I, Joann Renee Richardson, CCR, for the State of</p> <p>3 Missouri, do hereby certify that the deposition of</p> <p>4 STERLING REAM was held on November 4, 2020, via</p> <p>5 videoconference, State of Missouri, and was held on the</p> <p>6 time and in the place previously described.</p> <p>7</p> <p>8 IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>9 and seal.</p> <p>10</p> <p>11</p> <p>12</p> <p>13 _____</p> <p>14 Joann Renee Richardson, CCR</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 ALARIS LITIGATION SERVICES</p> <p>2 November 20, 2020</p> <p>3 Mr. Michael L. Matula Ogletree Deakins 4 4520 Main Street, Suite 400 Kansas City, Missouri 64111</p> <p>5 IN RE: TERRI YOLANDA LABLANCE v. MISSOURI 6 DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH</p> <p>7 Dear Mr. Matula,</p> <p>8 Please find enclosed your copies of the deposition of STERLING REAM taken on November 4, 2020 in the 9 above-referenced case. Also enclosed is the original 10 signature page and errata sheets.</p> <p>11 Please have the witness read your copy of the 12 transcript, indicate any changes and/or corrections 13 desired on the errata sheets, and sign the signature 14 page before a notary public.</p> <p>15 Please return the errata sheets and notarized 16 signature page within 30 days to our office at 711 N 17 11th Street, St. Louis, MO 63101 for filing.</p> <p>18 Sincerely,</p> <p>19 Joann Renee Richardson</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 STATE OF _____)</p> <p>2 COUNTY OF _____)</p> <p>3</p> <p>4 I, STERLING REAM, do hereby certify:</p> <p>5 That I have read the foregoing deposition;</p> <p>6 That I have made such changes in form 7 and/or substance to the within deposition as might 8 be necessary to render the same true and correct;</p> <p>9 That having made such changes thereon, I 10 hereby subscribe my name to the deposition.</p> <p>11 I declare under penalty of perjury that the 12 foregoing is true and correct.</p> <p>13 Executed this _____ day of _____, 14 20____, at _____.</p> <p>15</p> <p>16 _____</p> <p>17 STERLING REAM</p> <p>18</p> <p>19 _____</p> <p>20 NOTARY PUBLIC</p> <p>21 My Commission Expires: 22 100180</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 54</p> <p>1 ERRATA SHEET</p> <p>2 Witness Name: STERLING REAM</p> <p>3 Case Name: TERRI YOLANDA LABLANCE v. MISSOURI DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH</p> <p>4 Date Taken: NOVEMBER 4, 2020</p> <p>5</p> <p>6 Page # _____ Line # _____</p> <p>7 Should read: _____</p> <p>8 Reason for change: _____</p> <p>9</p> <p>10 Page # _____ Line # _____</p> <p>11 Should read: _____</p> <p>12 Reason for change: _____</p> <p>13</p> <p>14 Page # _____ Line # _____</p> <p>15 Should read: _____</p> <p>16 Reason for change: _____</p> <p>17</p> <p>18 Page # _____ Line # _____</p> <p>19 Should read: _____</p> <p>20 Reason for change: _____</p> <p>21</p> <p>22 Page # _____ Line # _____</p> <p>23 Should read: _____</p> <p>24 Reason for change: _____</p> <p>25</p> <p>26 Witness Signature: _____</p>	

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